Donald D. duBoulay

Attorney at Law

Telephone: (212) 966-3970 Fax: (212) 941-7108 dondubesq@aol.com E-mail:

April 8, 2021

305 Broadway, Suite 602 New York, NY 10007

The Honorable Paul G. Gardephe United States District Judge Southern District of New York Thurgood Marshall Courthouse 40 Foley Square New York, New York 10007

Re: United States v. Graciela Borrero

19 Cr. 789 (PGG)

MEMO ENDORSED

The Application is granted.

ORDERED:

Dated: April 9, 2021

Dear Judge Gardephe:

I write on behalf of my client Graciela Borrero to respectfully request that the court amend the terms of her pretrial release bond to allow her to travel to Puerto Rico to visit her elderly mother. If permitted Ms. Borrero would travel on April 21, 2021 and return on April 25, 2021. She would reside with her family at URB. La Granja, Calle pepita garcel B#2, Caguas PR 000725

Ms. Borrero was released on a \$50,000.00 PRB on November 7, 2019 and she has been compliant with all the terms of her bond. Her travel is presently restricted to the Southern and Eastern Districts of New York.

The Government and Pretrial officer Courtney DeFeo take no position on this request.

Respectfully submitted, /s/

Donald duBoulay

cc: Louis A. Pellegrino, AUSA Mathew Andrews, AUSA Courtney DeFeo, PTO